Shell Chemical Company



One Shell Plaza PO Box 4320 Houston TX 77210-4320

Contains No CB1 8EHQ - 0698 - 14201

June 3, 1998

Document Processing Center (TS-790) Office of Toxic Substances U.S. Environmental Protection Agency 401 M Street, S.W. Washington, D.C. 20460 ATTN: 8(e) Coordinator

Dear Sir:

SUBJECT: NEUROBEHAVIORAL CHANGES IN HUMANS EXPOSED TO WHITE **SPIRIT**

The following information is submitted under TSCA 8(e), since it may constitute substantial health risk information not previously known to the Administrator.

Small but significant declines in motor performance were reported in a study of human volunteers exposed to 100 ppm white spirit for 4 hours. Motor performance was measured by finger tapping, reaction time, and color word vigilance tests. The study was performed by the Netherlands Organization for Applied Scientific Research (TNO) and sponsored in part by CEFIC. The objective of the study was primarily to evaluate the sensitivity of the test methods to occupationally relevant hydrocarbon solvent exposure.

Shell Chemical Co. became aware of the information during a routine review of the toxicology of hydrocarbon solvents; the information reported here was taken from a communication with European Shell toxicologists involved in a technical review of the TNO study report. A copy of the TNO study is not presently available. Although Shell Chemical Co. does not manufacture a product designated as white spirit or Stoddard solvent, Shell does produce Shell Mineral Spirits 135, a product chemically similar to $\stackrel{\sim}{\sim}$ white spirit.

Since neurobehavioral effects were reported in humans at a 4-hr exposure level (100 -ppm) which was lower than the OSHA PEL (500 ppm) or ACGIH 8-hr TLV/TWA (100 50 ppm) occupational exposure limits, possible implications for the safety of Shell workers potentially exposed to similar Shell products is under review. If it is determined that current hazard communication warnings are inadequate, MSDS's will be revised accordingly. Shell currently provides MSDS warnings for CNS effects from exposure to solvent vapors.

This report is filed to provide information EPA may find useful. In no way is it intended as a waiver of any rights or privileges belonging to Shell Chemical Company as the reporting corporation, its agents or employees. The reporting corporation, its agents and employees, reserve the right to object to this report's use or admissibility in any subsequent judicial or administrative proceeding against the corporation, its agents or employees.

This report has been compiled based on information available as of the date of filing. The corporation, its agents and employees reserve the right to supplement the data contained in this report, and to revise and amend any conclusions drawn therefrom.

This report contains no confidential business information.

The following person should be contacted if you have questions or a need for discussion.

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Very truly yours,

R. N. Shulman, Vice President Health, Safety, and Environment

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Shell Chemical Company and Shell Oil Products Company

THG/sjh